

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, JOSH NAVARRO, NICO
TRAMONTANA, BITCOIN VENTURES 2020, LLC,
YASAR CORPORATION and ONEPURPOSE LTD.,

Plaintiffs.

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

against-

Civ. Action No.: Civ. Action No.:
1:20-cv-04448-LJL

CHET MINING CO, LLC, CHET MINING CO CANADA
LTD., and CHET STOJANOVICH,

Defendants.

PLEASE TAKE NOTICE, that the plaintiff, by and through its undersigned attorney, will
move this Court for an Order granting the relief described below, at the time and place set forth below:

<u>Moving Party:</u>	Plaintiffs Alex Holmes, Josh Navarro, Nico Tramontana, and Bitcoin Ventures 2020, LLC
<u>Motion Directed To:</u>	Defendants Chet Mining Co., LLC, Chet Mining Co. Canada Ltd., and Chet Stojanovich
<u>Motion Date:</u>	_____, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, N.Y. 10007-1312.
<u>Relief Sought:</u>	A default judgment against all defendants, jointly and severally, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Local Rule 55.2(b) of this Court, in favor of the Moving Parties.
<u>Supporting Papers:</u>	The papers offered in support of the motion are: (i) the Attorney Affirmation of Benjamin F. Neidl with Exhibits; (ii) the Declaration of Alex Holmes with Exhibits; (iii) the Declaration of Josh Navarro with Exhibits; (iv) the Declaration of Nico Tramontana with Exhibits; (v) the Declaration of Lars Eller with Exhibits; (vi) the Statements of Damages of each such plaintiff; and (vii) the proposed Default Judgments in favor of each such plaintiff; and (viii) all other paper and pleadings previously filed herein.

PLEASE TAKE FURTHER NOTICE, that the defendants must file their opposition papers (if any) with the Court and serve them upon the undersigned not less than _____ days prior to the above-listed Motion Date. The plaintiff intends to serve and file reply papers.

Dated: Troy, New York
September 24,, 2020

Respectfully submitted,

E. STEWART JONES HACKER MURPHY LLP

A handwritten signature in black ink, appearing to read "Benjamin F. Neidl", written over a horizontal line.

By: Benjamin F. Neidl
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